



FOSTER WHEELER ENVIRONMENTAL CORPORATION

June 19, 1998

File #: 1284-DO09-98-0287

Contracting Officer
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop #82
Lester, PA 19113
Attn: Paul Briegel

**Subject: US NAVY CONTRACT NO. N62472-94-D-0398
DELIVERY ORDER NO. 009
NAVAL AIR WARFARE CENTER (NAWC), TRENTON, NJ
DRAFT SITE-SPECIFIC HEALTH AND SAFETY PLAN
RESPONSE TO COMMENTS**

Dear Mr. Briegel:

We have reviewed the Navy comments, provided by the Navy Environmental Health Center, regarding the Draft Site-Specific Health and Safety Plan (SSHSP) for the subject project. Their comments and our responses are presented below.

Specific Comments:

1. **COMMENTS: Pages 2 and 3, Section 3.0, "Site Location and Project Description"**
 - a. Throughout the plan, lead and asbestos are noted as potential contaminants of concern (COCs). Appendix B notes that asbestos will be removed by a licensed contractor. Lead abatement is not mentioned further.
 - b. The seventh paragraph, entitled "Groundwater" states, "No groundwater results were provided for this HASP." If potential exposure to contaminated groundwater exists during this scope of work, then appropriate guidance should be included in the HASP.

Recommendations:

- a. State that all asbestos abatement work will be done in accordance with applicable OSHA regulations. Include a similar statement if a lead abatement contractor will be utilized. If Foster Wheeler employees will be exposed to lead, include precautionary information; such as, air monitoring and PPE selection, in the HASP.
- b. Review tasks to be performed under this scope of work and include information about groundwater as appropriate.

RESPONSE:

- a. An asbestos control plan will be developed by FWENC to address hazards of ACM removal by FWENC employees and will be an addendum included in the Site-Specific plan.. Lead paint covering steel columns will not be removed as part of demolition prior to felling columns, so we anticipate minimal exposure to lead. We will however, follow the provisions of the OSHA Lead Standard.
- b. After review of the tasks it has been concluded that exposure to groundwater will not occur.

2. COMMENTS: Pages 7 through 9, Section 4.0, "Potential Hazards":

- a. Section 4.2, "Biological Hazards": The first and second sentences state, "During the course of the project, there is a potential for workers to come in contact with biological hazards, such as animals, insects and plants. The activity hazard analysis, found in Appendix B, will include specific hazards and control measures for each task." Appendix B contains no reference to potential biological hazards or guidance for avoiding them.
- b. Section 4.3, "Physical Hazards": The procedures for recognizing and effectively dealing with heat stress injuries is not provided in this section, however, the reader is referred to Appendix B (heat stress is cited as a hazard only during the mobilization taskings), or the Master Site Health and Safety Plan. Section 4.2.1, "Heat Stress," of the Master Plan simply provides the main elements of the program as found in the corporate heat stress program. This method of instruction by reference would require that Foster Wheeler maintain a third reference on-site (i.e., the FW Corporate Health and Safety Program).

Recommendations:

- a. Include pertinent information for avoiding biological hazards (i.e., ticks) such as protective clothing, insect repellants, and periodic and end of shift, "buddy and self-checks."
- b. Include additional information on the proper field management of heat stress injuries in either the site-specific or master document.

RESPONSE:

- a. Pertinent information for biological hazards will be included in the Final Master HASP, Section 4.0. There are no biological hazards in this phase.
- b. Specific information on field management of heat stress is included in the Foster Wheeler Environmental Corporate Health and Safety Guidelines EHS 4-6. We have referenced FWENC procedures in the past in this manner with Navy acceptance. Standard FWENC practice is to maintain computer access to programs or have a hard copy H&S manual on-site.

3. **COMMENTS: Pages 10 and 11, Table 6-1, "Personal Protective Equipment Selection":**

- a. Page 10, the last item in the "Task" column is to excavate 30 yards of PCB contaminated soil from areas adjacent to brine house #46. Respiratory protection required for excavation is cited as "Initially none; upgrade possible based on real time air monitoring." This may not provide adequate respiratory protection to personnel performing this task.
- b. Page 11, the second task, "Stockpile and dispose of scrap debris (possible Lead contamination)" cites the level of protection (LOP) as "Level C APR w/HEPA cartridge." However, on page 14, Table 7-2, "Frequency and Location of Real Time Air Monitoring," for the task of "Stock pile scrap debris," no monitoring is scheduled. Without monitoring information, the appropriate respiratory protection cannot be selected.

Recommendations:

- a. We recommend using a higher level of protection initially and then downgrading as data is developed to justify the downgrade, or provide the rationale for not using the higher level.
- b. State how the respiratory LOP determinations are made. Include the rationale for upgrading or downgrading respiratory protection.

RESPONSE:

- a. Based on the existing data regarding the concentration of PCBs in soil and the type of work being performed, level D respiratory protection is an appropriate initial LOP for this task. The level of dust in air would have to exceed 50 mg/m³ to exceed the OSHA PEL. Based on the PCB concentrations in soil, the action level for dust (PCBs) on this site will be set at 2.5 mg/m³. Previous PCB air sampling indicated that no significant exposures occurred.
- b. Personal air monitoring will be performed. In addition, Level C respiratory protection will provide adequate protection to 50 times the OSHA PEL for lead.

4. **COMMENT: Page 12, Section 7.0, "Air Monitoring":**

A method to provide air monitoring information to employees is not included.

Recommendation:

Clearly state how monitoring information will be provided to employees.

RESPONSE:

Recommendation will be included in the Final Site-Specific HASP.

5. **Comment: Page 16, Section 12.0, "Emergency Response Plan":**
A site-specific map is not included.

Recommendation:


Include a site map showing the layout of the work areas and the decontamination facilities.

RESPONSE:

Recommendation will be included in the final Site-Specific HASP.

If you have any questions please call me at 702-4016.

Sincerely,


Arthur B. Holcomb, P.E. CIH
Program Manager

ABH/st

cc: G. Coppi
A. Aziz
J. Giandonato
D. Kopcow
File